

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re:

BESTWALL LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 17-31795 (LTB)

BESTWALL LLC,

Plaintiff,

v.

Adv. Pro. No. 17-3105 (LTB)

THOSE PARTIES LISTED ON APPENDIX  
A TO COMPLAINT and JOHN AND JANE  
DOES 1-1000,

Defendants.

**JOINDER TO THE OBJECTIONS FILED BY THE OFFICIAL COMMITTEE OF  
ASBESTOS CLAIMANTS AND THE FUTURE CLAIMANTS' REPRESENTATIVE**

The undersigned, on behalf of its clients (collectively, the “Affected Individuals”) identified in Appendix A to the Debtor’s Motion for an Order (I) Preliminarily Enjoining Certain Actions Against Non-Debtors, or (II) in the Alternative, Declaring that the Automatic Stay Applies to Such Actions and (III) Granting a Temporary Restraining Order Pending a Full Hearing on the Motion [Adv. Docket No. 2] (the “Motion”) joins in the arguments and papers filed in the above-captioned adversary proceeding by the Official Committee of Asbestos Claimants of Bestwall LLC (the “Committee”) and the Future Claimants Representative (the

---

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 5815. The Debtor’s address is 100 Peachtree Street, N.W., Atlanta, GA 30303.

“FCR”) including:

1. Objection of the Official Committee of Asbestos Claimants to Debtor’s Motion for An Order (I) Preliminary Enjoining Certain Actions Against Non-Debtors, or (II) in the Alternative, Declaring that Certain Actions Against Non-Debtors, or (II) in the Alternative, Declaring that Automatic Stay Applies to Such Actions and (II) Granting Temporary Restraining Order Pending a Full Hearing on the Motion (the “Committee Objection”); and

2. Future Claimants’ Representative’s Objection to Debtor’s Motion for an Order (I) Preliminarily Enjoining Certain Actions Against Non-Debtors, or (II) in the Alternative, Declaring that the Automatic Stay Applies to Such Actions and (III) Granting a Temporary Restraining Order Pending a Full Hearing on the Motion (the “FCR Objection”).

The Affected Individuals join in the Committee Objection and the FCR Objection and incorporate herein the arguments set forth therein.

WHEREFORE, the Affected Individuals request that the Court: (i) deny the relief requested in the Motion, and (ii) grant such other and further relief as is just and proper.

Dated: August 14, 2018  
Charlotte, North Carolina

ESSEX RICHARDS, P.A.

/s/ Heather W. Culp

Heather W. Culp  
NC Bar No. 30386  
1701 South Boulevard  
Charlotte, North Carolina 28203  
Telephone: (704) 377-4300  
Facsimile: (704) 372-1357  
E-mail: hculp@essexrichards.com

-and-

/s/ Thomas W. Bevan

*pro hac vice pending*

Thomas W. Bevan  
OH Bar No. 54063  
Bevan and Associates LPA, Inc.  
6555 Dean Memorial Parkway  
Boston Heights, Ohio 44236  
Telephone: (330) 650-0088  
Facsimile: (330) 467-4493  
E-mail: tbevan@bevanlaw.com

*Co-Counsel to the Affected Individuals*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16 day of August, 2018, I electronically filed this **JOINDER TO THE OBJECTIONS FILED BY THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS AND THE FUTURE CLAIMANTS' REPRESENTATIVE** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties:

Garland S. Cassada  
Robinson Bradshaw & Hinson  
101 N. Tryon St.  
Suite 1900  
Charlotte, NC 28246

Jonathan C. Krisko  
Robinson, Bradshaw & Hinson, P.A.  
101 N. Tryon Street  
Suite 1900  
Charlotte, NC 28246

Andrew W.J. Tarr  
Robinson, Bradshaw & Hinson, PA  
101 N. Tryon St.  
Suite 1900  
Charlotte, NC 28246

Felton Parrish  
Hull & Chandler, P.A.  
1001 Morehead Square Drive, Suite 450  
Charlotte, NC 28203

William Marc Graham  
Wallace and Graham P.A.  
525 North Main Street  
Salisbury, NC 28144

Natalie D. Ramsey  
Montgomery McCracken Walker and Rhoads LLP  
1105 North Market Street, 15th Floor  
Wilmington, DE 19810

Linda Wright Simpson  
JD Thompson Law  
PO Box 33127  
Charlotte, NC 28233

Glenn C. Thompson  
Hamilton Stephens Steele & Martin  
525 North Tryon Street  
Suite 1400  
Charlotte, NC 28202

Judy D. Thompson  
JD Thompson Law  
P.O. Box 33127  
Charlotte, NC 28233

Davis Lee Wright  
Montgomery, McCracken, Walker & Rhoads LLP  
1105 North Market Street, 15<sup>th</sup> Floor  
Wilmington, DE 19801

I further certify that I served a copy of the foregoing on the following via email only.

Thomas W. Bevan  
Bevan And Associates LPA, Inc.  
6555 Dean Memorial Parkway  
Boston Heights, Ohio 44236



---

Heather W. Culp  
NC Bar No. 30386  
Local Counsel for Certain Affected Individuals  
Essex Richards, P.A.  
1701 South Boulevard  
Charlotte, North Carolina 28203  
Tel: (704) 377-4300  
Fax: (704) 372-1357  
E-mail: hculp@essexrichards.com